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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

ALFRED PLACERES, Case No. 15-10691 (SMB)

Debtor. Chapter 7

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JOSE BORGES,

Plaintiff, Adv. Proc. No. 15-01356-SMB  
-against-

ALFRED PLACERES,

Defendant.

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**NOTICE OF MOTION BY DEFENDANT ALFRED PLACERES FOR SUMMARY  
JUDGMENT PURSUANT TO FED. R. BANKR. PROC. 7056**

**PLEASE TAKE NOTICE**, upon the Statement of Material Facts Pursuant to Local Bankruptcy Rule 7056-1, the Declaration of Norma E. Ortiz, the Declaration of Alfred Placeres (“Defendant”), the Memorandum of Law, and all attached exhibits, the Defendant will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge for the Southern District of New York, at the United States Bankruptcy Courthouse, One Bowling Green, New York, New York, 10004-1408, at a date and time to be determined by the Court (should the Court determine that oral argument is necessary), for the entry of an order granting summary judgment to the Defendant, pursuant to Fed. R. Bankr. Proc. 7056, on all claims raised in the instant adversary proceeding by the Plaintiff Jose Borges (“Plaintiff”), and for such other relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the Plaintiff must file and serve a response no later than June 10, 2016, as required by the Scheduling Order entered by the Court on May 11, 2016, upon the Court and Defendant’s Counsel.

Dated: May 27, 2016  
Astoria, New York

S/Norma E. Ortiz  
Norma E. Ortiz  
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Defendant’s Counsel